

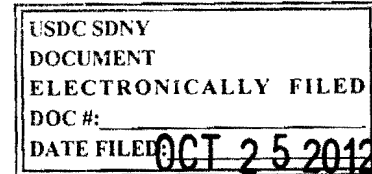
**Robbins Geller
Rudman & Dowd LLP**

Atlanta
Boca Raton
Chicago

Melville
New York
Philadelphia

San Diego
San Francisco
Washington, DC

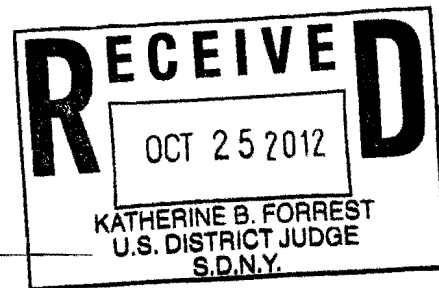
David A. Rosenfeld
drosenfeld@rgrdlaw.com



October 24, 2012

VIA HAND DELIVERY

The Honorable Katherine B. Forrest
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312



Re: *Sinay vs. CNOOC Ltd.*,
Civil Action No. 12-CV-1513

Dear Judge Forrest:

We represent Plaintiff Sam Sinay ("Plaintiff") and Lead Plaintiff Roofers Local No. 149 Pension Funds ("Roofers Local 149") in the above-referenced matter. In accordance with the Court's request, Lead Plaintiff respectfully submits this report to provide the Court with an update on the status of this action which is brought on behalf of all purchasers of American Depositary Shares ("ADS") of CNOOC Limited ("CNOOC") between January 27, 2011, and September 16, 2011, against CNOOC and certain of its officers and/or directors (the "Individual Defendants") for violations of the Securities Exchange Act of 1934 (this "Action").

On February 29, 2012, Plaintiff filed the complaint (the "Complaint"). On April 16, 2012, Plaintiff attempted to serve CNOOC at its Texas subsidiary, OOGC America Inc., but service was not accepted. *See* Affidavit of Reasonable Diligence attached hereto as Exhibit A. On April 18, 2012, Plaintiff attempted to serve CNOOC at a different address in Texas but service was again not accepted. *See id.*

On April 24, 2012, Plaintiff attempted to serve both CNOOC and the Individual Defendants overseas via APS International. *See* APS Letters attached hereto as Exhibit B. Shortly thereafter, on April 30, 2012, Roofers Local No. 149 moved the Court to: (i) appoint it as Lead Plaintiff; and (ii) approve its selection of Robbins Geller Rudman & Dowd to serve as Lead Counsel. On July 31, 2012, during the pendency of this motion, Plaintiff, through APS International, sent a letter to the Chief Secretary of Administration in Hong Kong requesting a status update on the service efforts abroad. *See* Ex. B. On October 4, 2012, having still received no response, APS International sent another request to the Chief Secretary of Administration in Hong Kong for a status update on the service efforts. *See id.*

**Robbins Geller
Rudman & Dowd LLP**

The Honorable Katherine B. Forrest
October 24, 2012
Page 2

On September 24, 2012, Judge Barbara S. Jones granted Lead Plaintiff's motion and appointed Roofers Local No. 149 as Lead Plaintiff and approved its selection of Robbins Geller Rudman & Dowd as Lead Counsel. On October 11, 2012, a local service address for CNOOC was identified and Plaintiff served the Complaint on CNOOC at CT Corporation Systems, 111 Eighth Avenue, New York, NY, 10011. Service of process was accepted on behalf of CNOOC. *See* Proof of Service attached hereto as Exhibit C. Plaintiff was then informed that CNOOC selected Robert Pietrzak of Sidley Austin LLP to serve as its counsel in this Action. To date, service has not been accepted by the Individual Defendants in Hong Kong and efforts to serve them are ongoing. On October 17, 2012, this Action was re-assigned to Your Honor. Pursuant to the Court's Order, the Amended Complaint is due on November 8, 2012.

Respectfully submitted,



David A. Rosenfeld

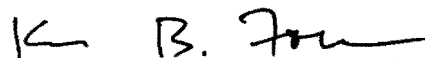
DAR/PAF

cc: Robert Pietrzak, Esq. (Counsel for CNOOC)

*Plaintiffs are directed to file proof
of service on the docket, and comply
with all other rules regarding
service.*

Oct. 25, 2012

SO ORDERED:



**HON. KATHERINE B. FORREST
UNITED STATES DISTRICT JUDGE**

Attorney or Party without Attorney: Samuel H. Rudman, Esq. Robbins Geller Rudman & Dowd LLP 58 South Service Road, Suite 200 Melville, NY 11747 Telephone No: 631-367-7100 FAX: No: 631-367-1173				For Court Use Only	
Attorney for: Plaintiff			Ref. No or File No.:		
Insert name of Court, and Judicial District and Branch Court: United States District Court - Southern District Of New York					
Plaintiff: Sam Sinay, et al., Defendant: Cnooc Limited, et al.,					
Affidavit of Reasonable Diligence		Hearing Date:	Time:	Dept/Div:	Case Number: 12CV1513

- I, Jayme Chacon, and any employee or independent contractors retained by Class Action Research & Litigation are and were on the dates mentioned herein over the age of eighteen years and not a party to this action. Personal service was attempted on Defendant CNOOC Limited as follows:
- Documents:** Summons in a Civil Action; Complaint; Individual Practices of Judge Barbara S. Jones; ECF Rules & Instructions.

Day	Date	Time	Location	Results
Mon	04/16/12	4:10pm	Business	Per the receptionist, this company is located in Hong Kong and they are not authorized to accept service for this company. The companies are two completely different entities. Attempt made by: Jayme Chacon. Attempt at: OOGC, America, Inc. 11700 Kate Freeway, Suite 280 Houston TX 77079.
Wed	04/18/12	4:01pm	Business	I spoke with Mr. Li and he said he has never been and is not currently the agent for this company and is not authorized to accept service on their behalf. Attempt made by: Jayme Chacon. Attempt at: c/o Jianfa Li, Agent for Service Lico International, Inc. 10777 Westheimer Rd # 840 Houston TX 77042.
Thu	04/19/12	3:00pm	Business	Returned Not Served on: CNOOC Limited Business - c/o Jianfa Li, Agent for Service Lico International, Inc. 10777 Westheimer Rd # 840 Houston, TX 77042

- Person Executing**
 - Jayme Chacon
 - Class Action Research & Litigation
P O Box 740
Penryn, CA 95663
 - (916) 663-2562, FAX (916) 663-4955

Recoverable Costs Per CCP 1033.5(a)(4)(B)
d. The Fee for service was:
e. I am: (3) Not a Registered California Process Server

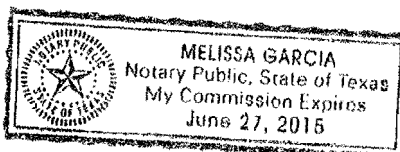
- I declare under penalty of perjury under the laws of the State of Texas and under the laws of the United States Of America that the foregoing is true and correct.

Date: Tue, Apr. 24, 2012

SUBSCRIBED AND SWORN BEFORE ME
THIS 21st DAY OF April, 2012
Melissa Garcia

Affidavit of Reasonable Diligence

(Jayme Chacon) SCH#2516 EXP. 2/28/13
 1e32.127340



MAY 11 2012

APS International Plaza • 7800 Glenroy Road
Minneapolis, Minnesota 55439-3122
PHONE: (952) 831-7776
FAX: (952) 831-8150

APS International, Ltd.

July 31, 2012

Chief Secretary for Administration
Room 321, 3/F, East Wing, Central Gov't Offices
2 Tim Mei Avenue
Admiralty, Hong Kong, China

RE: Service of Process upon: CNOOC Limited
Case Number: 12 CV 1513

Dear Sir/Madam:

Documents for service of process under the Hague Convention on the Service Abroad of Judicial & Extrajudicial Documents in Civil or Commercial Matters, were sent to you on April 24, 2012, in the lawsuit: Sinay v CNOOC Limited

Since that time we have heard nothing.

We sent the following documents via Federal Express courier.

- 1) Request, Certificate/Attestation and Summary of Documents.
- 2) Two (2) copies of the documents to be served.

Federal Express confirmed receipt of the documents on April 27, 2012.

If you do not have a record of receiving the original request, please promptly respond to this letter via facsimile and we will forward a duplicate request for service to you.

Please let us know the status of these papers;

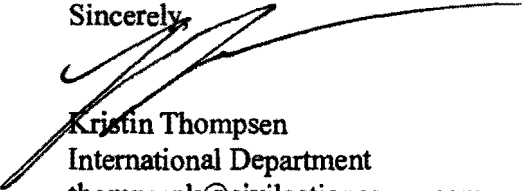
- 1) Have the documents been served? _____.
- 2) If so, when, where and on whom were they served? _____.
- 3) Where is the Certificate/Attestation and when can we expect it? _____.

The United States has executed Declaration 3 to the Treaty, which adopts Paragraph 2 of Article 15 which allows for a default judgment in a United States Court, notwithstanding the absence of proof of service. In accordance with this provision, we will be requesting the United States Court to grant judgment by default against **CNOOC Limited** after **October 31, 2012**.

We have enclosed a duplicate of this letter upon which you may apply, together with an envelope addressed to us for your convenience.

Thank you for your prompt consideration.

Sincerely,



Kristin Thompson
International Department
thompsonk@civilactiongroup.com
Fax Number: 952-831-8150

APS International Plaza • 7800 Glenroy Road
Minneapolis, Minnesota 55439-3122
PHONE: (952) 831-7776
FAX: (952) 831-8150

APS International, Ltd.

July 31, 2012

Chief Secretary for Administration
Room 321, 3/F, East Wing, Central Gov't Offices
2 Tim Mei Avenue
Admiralty, Hong Kong, China

RE: Service of Process upon: **Yang Hua**
Case Number: 12 CV 1513

Dear Sir/Madam:

Documents for service of process under the Hague Convention on the Service Abroad of Judicial & Extrajudicial Documents in Civil or Commercial Matters, were sent to you on April 24, 2012, in the lawsuit: **Sinay v CNOOC Limited**

Since that time we have heard nothing.

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Please let us know the status of these papers;

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- 2) If so, when, where and on whom were they served?
_____.
- 3) Where is the Certificate/Attestation and when can we expect it?

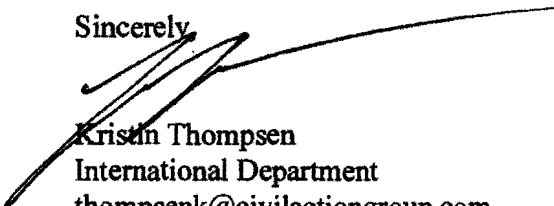
_____.

The United States has executed Declaration 3 to the Treaty, which adopts Paragraph 2 of Article 15 which allows for a default judgment in a United States Court, notwithstanding the absence of proof of service. In accordance with this provision, we will be requesting the United States Court to grant judgment by default against **Yang Hua** after **October 31, 2012**.

We have enclosed a duplicate of this letter upon which you may apply, together with an envelope addressed to us for your convenience.

Thank you for your prompt consideration.

Sincerely,



Kristin Thompson
International Department
thompsonk@civildactiongroup.com
Fax Number: 952-831-8150

APS International Plaza • 7800 Glenroy Road
Minneapolis, Minnesota 55439-3122
PHONE: (952) 831-7776
FAX: (952) 831-8150

APS International, Ltd.

July 31, 2012

Chief Secretary for Administration
Room 321, 3/F, East Wing, Central Gov't Offices
2 Tim Mei Avenue
Admiralty, Hong Kong, China

RE: Service of Process upon: Zhong Hua
Case Number: 12 CV 1513

Dear Sir/Madam:

Documents for service of process under the Hague Convention on the Service Abroad of Judicial & Extrajudicial Documents in Civil or Commercial Matters, were sent to you on April 24, 2012, in the lawsuit: **Sinay v CNOOC Limited**

Since that time we have heard nothing.

We sent the following documents via Federal Express courier.

- 1) Request, Certificate/Attestation and Summary of Documents.
- 2) Two (2) copies of the documents to be served.

Federal Express confirmed receipt of the documents on April 27, 2012.

If you do not have a record of receiving the original request, please promptly respond to this letter via facsimile and we will forward a duplicate request for service to you.

Please let us know the status of these papers;

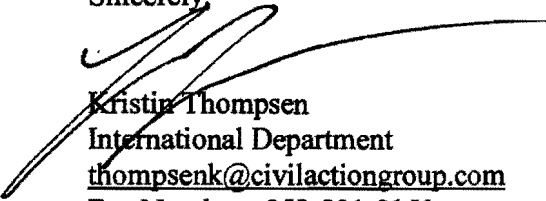
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The United States has executed Declaration 3 to the Treaty, which adopts Paragraph 2 of Article 15 which allows for a default judgment in a United States Court, notwithstanding the absence of proof of service. In accordance with this provision, we will be requesting the United States Court to grant judgment by default against **Zhong Hua** after **October 31, 2012**.

We have enclosed a duplicate of this letter upon which you may apply, together with an envelope addressed to us for your convenience.

Thank you for your prompt consideration.

Sincerely,



Kristin Thompson
International Department
thompsonk@civiliationgroup.com
Fax Number: 952-831-8150

APS International Plaza • 7800 Glenroy Road
Minneapolis, Minnesota 55439-3122
PHONE: (952) 831-7776
FAX: (952) 831-8150

APS International, Ltd.

October 4, 2012

Chief Secretary for Administration
Hong Kong SAR Government
Room 321, 3/F, East Wing, Central Gov't Offices
2 Tim Mei Avenue
Admiralty, Hong Kong, China

RE: Service of Process upon: **CNOOC Limited**

CASE NO: 12 CV 1513

Dear Sir/Madam:

Documents for service of process under the Hague Convention on the Service Abroad of Judicial & Extrajudicial Documents in Civil or Commercial Matters, were sent to you on April 27, 2012 in the lawsuit: Sinay v CNOOC Limited

We sent the following documents via Federal Express courier.

- 1) Request, Certificate/Attestation and Summary of Documents.
- 2) Two (2) copies of the documents to be served.

We also sent a letter requesting status of service on September 5, 2012, via Federal Express.

Please let us know the status of these papers;

- 1) Have the documents been served? _____.
- 2) If so, when, where and on whom were they served?
_____.
- 3) Where is the Certificate/Attestation and when can we expect it?

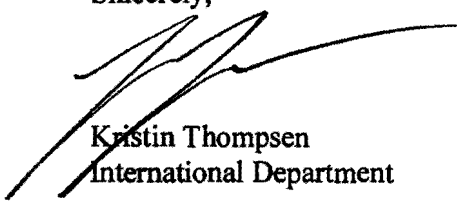
_____.

Page 2 of 2

The United States has executed Declaration 3 to the Treaty, which adopts Paragraph 2 of Article 15 and allows for a default judgment in a United States Court, notwithstanding the absence of proof of service. In accordance with this provision, we will be requesting the United States Court to grant judgment by default against **CNOOC Limited**, your citizen, after **November 5, 2012**.

Thank you for your prompt consideration.

Sincerely,



Kristin Thompson
International Department

APS International Plaza • 7800 Glenroy Road
Minneapolis, Minnesota 55439-3122
PHONE: (952) 831-7776
FAX: (952) 831-8150

APS International, Ltd.

October 4, 2012

Chief Secretary for Administration
Hong Kong SAR Government
Room 321, 3/F, East Wing, Central Gov't Offices
2 Tim Mei Avenue
Admiralty, Hong Kong, China

RE: Service of Process upon: **Yang Hua**

CASE NO: 12 CV 1513

Dear Sir/Madam:

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- 1) Have the documents been served? _____.
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_____.

Page 2 of 2

The United States has executed Declaration 3 to the Treaty, which adopts Paragraph 2 of Article 15 and allows for a default judgment in a United States Court, notwithstanding the absence of proof of service. In accordance with this provision, we will be requesting the United States Court to grant judgment by default against Yang Hua, your citizen, after November 5, 2012.

Thank you for your prompt consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristin Thompson', with a long, sweeping horizontal line extending to the right.

Kristin Thompson
International Department

APS International Plaza • 7800 Glenroy Road
Minneapolis, Minnesota 55439-3122
PHONE: (952) 831-7776
FAX: (952) 831-8150

APS International, Ltd.

October 4, 2012

Chief Secretary for Administration
Hong Kong SAR Government
Room 321, 3/F, East Wing, Central Gov't Offices
2 Tim Mei Avenue
Admiralty, Hong Kong, China

RE: Service of Process upon: **Zhong Hua**

CASE NO: 12 CV 1513

Dear Sir/Madam:

Documents for service of process under the Hague Convention on the Service Abroad of Judicial & Extrajudicial Documents in Civil or Commercial Matters, were sent to you on April 27, 2012 in the lawsuit: Sinay v CNOOC Limited

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Page 2 of 2

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Thank you for your prompt consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristin Thompson', with a long, sweeping horizontal line extending to the right.

Kristin Thompson
International Department

AO 440 (Rev. 12/09) Summons in a Civil Action

JUDGE JONES

UNITED STATES DISTRICT COURT

for the
Southern District of New York

SAM SINAY, Individually and on Behalf of All Others
Similarly Situated

Plaintiff

v.

CNOOC LIMITED, YANG HUA and ZHONG HUA

Defendant

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* CNOOC Limited
65th Floor, Bank of China Tower
One Garden Road
Central,
Hong Kong

A lawsuit has been filed against you.

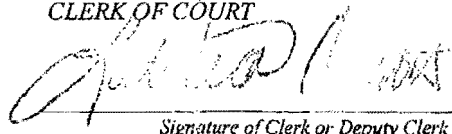
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Robbins Geller Rudman & Dowd LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

RUBY J. KRAJICK

CLERK OF COURT

Date: FEB 29 2012



Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for (name of individual and title, if any) CNOOC Limited
 was received by me on (date) 10/11/12.

☐ I personally served the summons on the individual at (place) _____
 on (date) _____; or

☐ I left the summons at the individual's residence or usual place of abode with (name) _____
 _____, a person of suitable age and discretion who resides there,
 on (date) _____, and mailed a copy to the individual's last known address; or

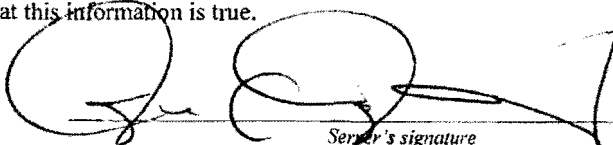
☒ I served the summons on (name of individual) AIXA Flores, who is
 designated by law to accept service of process on behalf of (name of organization) C+ Corp.
Accepting for CNOOC Limited on (date) 10/11/12 @ 3:07pm

☐ I returned the summons unexecuted because _____; or

☐ Other (specify): _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 10/12/12


Server's signature

DANIEL DiCarlo Process Server

Printed name and title

LOWER LEVEL
 889 MERRICK AVE.
 EAST MEADOW, N.Y. 11556

Server's address

Additional information regarding attempted service, etc: